

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KELLY ANDRADE,

Civil Case No.: 1:21-cv-05237

Plaintiff,

-against-

CULTURAL CARE, INC. d/b/a
CULTURAL CARE AU PAIR d/b/a
CULTURAL CARE;
MICHAEL ESPOSITO, individually; and
DANIELLE ESPOSITO,

**DEFENDANT CULTURAL CARE,
INC.'S MOTION FOR
CLARIFICATION/VIRTUAL
ATTENDANCE AT SETTLEMENT
CONFERENCE**

Jury Trial Demanded

Defendants.

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Defendant Cultural Care, Inc. (“Cultural Care”) hereby requests that this Court confirm that the settlement conference scheduled for March 1, 2022 will be conducted remotely via Microsoft Teams pursuant to Section II(D) of the Individual Practices of Magistrate Judge Sanket J. Bulsara, notwithstanding that the docket indicates it will take place in Courtroom 324N. *See* Docket 12/10/21. In the event the Court plans to conduct the settlement conference in-person at the courthouse, Cultural Care respectfully requests that it be allowed to attend virtually given that its counsel and corporate representative are located in Massachusetts (Boston area). Allowing Cultural Care to attend virtually would allow Cultural Care to avoid significant travel expenses necessary for counsel and the corporate representative to attend the settlement conference in person. In the alternative, in the event the Court would prefer an in-person appearance, Cultural Care respectfully requests permission for its counsel to attend in-person on its behalf and its corporate representative to be available via telephone.

Dated: February 17, 2022
Boston, Massachusetts

Respectfully Submitted,
CULTURAL CARE, INC.,
By its counsel,

/s/ Jeffrey P. Allen

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